

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Timothy Jackson,

Plaintiff,

v.

Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan, each in their official capacities as members of the Board of Regents for the University of North Texas System; **Rachel Gain; Ellen Bakulina; Andrew Chung; Diego Cubero; Steven Friedson; Rebecca Dowd Geoffroy-Schwinden; Benjamin Graf; Frank Heidelberger; Bernardo Illari; Justin Lavacek; Peter Mondelli; Margaret Notley; April L. Prince; Cathy Ragland; Gillian Robertson; Hendrik Schulze; Vivek Virani; and Brian F. Wright,** Defendants.

Case No. 4:21-cv-00033-ALM

**NOTICE OF STATUS OF SETTLEMENT AND
REQUEST FOR EXTENSION OF TIME**

In compliance with this Court's Order of March 12, 2025, Plaintiff respectfully submits this Notice of Status of Settlement and Request for Extension of Time. ECF No. 101.

This Court ordered the parties to file all papers necessary for closing this case and removing this case from the Court's active docket. Id. However, the final papers cannot be filed at this time, and Plaintiff, with the consent of all Defendants, respectfully requests an additional time of 30 days to file the necessary papers.

The parties nevertheless can report that a final draft version of the settlement has been circulated between them. However, the large number of Defendants has made it more difficult than anticipated to secure all necessary signatures to the parties' agreement.

The parties anticipate securing all necessary signatures to their settlement agreement by the end of next week, no later than April 18, 2025.

Plaintiff will thereafter file a joint stipulation of dismissal with prejudice as soon the settlement sum has been received by Plaintiff.

WHEREFORE, Plaintiff respectfully requests that this Court grant an additional 30 days for the parties to fulfill the requirements set forth in its Order On Closing Documents of March 12, 2025. ECF No. 101.

Respectfully submitted,

DATE: April 11, 2025

/s/Michael Thad Allen

Michael Thad Allen, Esq.
D. Conn. Bar No. CT29813
admitted *pro hac vice*
Lead Attorney
ALLEN LAW, LLC
PO Box 404
Quaker Hill, CT 06375
(860) 772-4738 (phone)
(860) 469-2783 (fax)
mallen@allenharrislaw.com

Jonathan Mitchell
Texas Bar No. 24075463
MITCHELL LAW PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

for PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the date specified in the caption of this document, I electronically filed the foregoing with the Clerk of Court, to be served on all parties of record via the CM/ECF system.

/s/Michael Thad Allen

Michael Thad Allen

CERTIFICATE OF CONFERENCE

I hereby certify that counsel has complied with the meet and confer requirement in Eastern District of Texas Local Rule CV-7(h). The instant motion is unopposed.

/s/Michael Thad Allen

Michael Thad Allen